

RECEIVED

JUN 2 2025

AT 8:30 _____ M
CLERK U.S. DISTRICT COURT

EXHIBIT A

WR

From DAG MCNEIL
DEPARTMENT OF LAW AND PUBLIC SAFETY

Richard J. Hughes Justice Complex

DIVISION OF LAW

PO BOX 112

TRENTON, NJ 08625

To:

Caleb L. McGillvary, SBI #102317G

New Jersey State Prison

P.O. Box 861

Trenton, NJ 08625

Legal mail

G-21

NEW JERSEY STATE PRISON

(Rev. 9/7/17)

Legal Mail/Accountable Non Legal Mail

Process and Delivery Receipt #

81
Inmate Name: Charles McGinnis Number: 1625179 Wing: 16R Date: 5-3-25

Sender: Dig McNeil Address: _____ Date (Postmark): 5-3-25

Processed by: (Print and Sign) _____ Date: _____

Traffic Control Officer (if relocated) (Print and Sign) _____ Date: _____

Issued by: (Officer Print and Sign) L. Aspin Wing: 6R Date: 5-4-25

Accepted by Inmate: (Print and Sign) [Signature] Date: 5/4/25

Refused by Inmate: (Print and Sign) _____ Date: _____

Item# _____

☒ Legal Mail

☐ Non Legal Accountable

☐ Regular First Class (No special handling)

☐ Inter Office (Truck Mail)

☐ Registered/Certified

☐ Return Receipt

☐ Priority Mail

☐ Express Mail

☐ Common Carrier Overnight or Priority Delivery
(FedEx, UPS, etc.) carrier: _____

Housing Officer: If inmate has moved, hand deliver immediately to Traffic Control.

Traffic Officer: Promptly locate inmate housing location in iTag and arrange for immediate delivery.

WHITE - Mailroom VM file

YELLOW - Inmate Receipt

EXHIBIT B



State of New Jersey

DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO BOX 112
TRENTON, NJ 08625-0112

PHILIP D. MURPHY
Governor

TAHESHA L. WAY
Lt. Governor

MATTHEW J. PLATKIN
Attorney General

MICHAEL C. WALTERS
Acting Director

April 29, 2025

VIA REGULAR AND CERTIFIED MAIL

Caleb L. McGillvary (SBI#102317G)
New Jersey State Prison
P.O. Box 861
Trenton, NJ 08625

**RE: Caleb L. McGillvary v. Ronald Reiz, et al.
Civil Dkt. No. 3:22-cv-6430-MAS-JBD
Subpoena Duces Tecum to New Jersey Department of Corrections**

Dear Mr. McGillvary:

This office represents non-party New Jersey Department of Corrections ("NJDOC"). Pursuant to Judge Day's February 6, 2025 Order (ECF No. 87), NJDOC was directed to "review relevant records and logbook entries for dates" that you subsequently provided in your correspondence dated January 31, 2025. Below please find NJDOC's response to your supplemental requests for logbook entries. Additionally, NJDOC's document production is enclosed herewith (DOC.McGillvary.Logbook.001-008).

To avoid unnecessary motion practice, I ask that you kindly confer with me about any perceived deficiencies in NJDOC's response.

Should you have any other questions or require additional information, please contact me immediately.

Very truly yours,

MATTHEW J. PLATKIN
ATTORNEY GENERAL OF NEW JERSEY

By: /s/Michael B. McNeil
Michael B. McNeil
Deputy Attorney General

Encls.



Caleb L. McGillvary – Subpoena Duces Tecum
April 29, 2025
Page 2

NJDOC'S RESPONSE TO SUBPOENA DUCES TECUM

1. In your January 31, 2025 letter, you requested the following: “[A]ll of the entries in which I am mentioned or otherwise appear; from the 6 Right NJSP Travel Log, the NJSP Traffic Control Log, the North Compound Clinic NJSP Travel Log, the 6 Right NJSP Officer Log Book, and the North Compound Clinic Officer Log Book” from 6:30 am to 5:00 pm on the following dates in 2021: November 1, 2, 3, 9, 10, 15, 16, 17, 23, 30; and December 1, 2, 6, 7, 8, 9, 13, 14, 15, 16, 17, 20, 22.

OBJECTION:

NJDOC objects to Plaintiff's request for travel logs, log books, and traffic control logs as overly burdensome and disproportionate to the needs of this litigation. Plaintiff is currently incarcerated in state prison, and his request for travel logs, log books, and traffic control logs would risk disclosing confidential procedures and movements within the secure environment. Courts have routinely recognized the concerns with providing incarcerated persons access to information about prison procedures. See, e.g., *Morris v. Bakos*, No. 14-201, 2016 WL 6476998 at *2 (W.D. Pa. Nov. 1, 2016) (denying a motion *in limine* to introduce policies related to camera operations within a prison as evidence in trial due in part to security concerns; *Grant v. Fisher*, No. 07-1870, 2012 WL 28260 at *1 (M.D. Pa. Jan. 5, 2012) (permitting modifications to prison surveillance video before evidence was shown at trial). Beyond the security concerns, it is unlikely that the travel logs, log books, and traffic control logs would have relevance to Plaintiff's case, which concerns medical treatment provided by DOC's medical provider. See *Rega v. Beard*, No. 08-156, 2010 WL 1253531 at *6 (W.D. Pa. Mar. 24, 2010) (denying production of log books to plaintiff finding that the logs, even if they provided the names and times personnel visited a unit, would not provide proof that they witnessed any particular activity that Plaintiff believes occurred).

Additionally, NJDOC objects to the disclosure of the travel logs, log books, and traffic control logs for this period because it would provide information to Plaintiff information about other incarcerated persons. New Jersey law recognized restrictions on the provision of information to one inmate about

Caleb L. McGillvary – Subpoena Duces Tecum
April 29, 2025
Page 3

other inmates. See N.J.A.C. 10A:22-2.3(b) (“[a]n inmate shall not be permitted to inspect, examine, or obtain copies of documents concerning any other inmate.”).

RESPONSE:

Notwithstanding and without waiving said objections, please see the following:

- Potentially relevant entries in the New Jersey State Prison Clinic Officer Log Book (DOC.McGillvary.Logbook.001-008).

2. In your January 31, 2025 letter, you also requested the following: “[A]ll of the entries in which Defendant Rahmo Reiz is mentioned or otherwise appears; from the 6 Right NJSP Officer Log Book, and the North Compound Clinic Officer Log Book” from 6:30 am to 5:00 pm on the following dates in 2022: January 10, 11, 12, 13, 14.

NJDOC objects to Plaintiff’s request for log books as overly burdensome and disproportionate to the needs of this litigation. Plaintiff is currently incarcerated in state prison, and his request for log books would risk disclosing confidential procedures and movements within the secure environment. Courts have routinely recognized the concerns with providing incarcerated persons access to information about prison procedures. See, e.g., *Morris v. Bakos*, No. 14-201, 2016 WL 6476998 at *2 (W.D. Pa. Nov. 1, 2016) (denying a motion *in limine* to introduce policies related to camera operations within a prison as evidence in trial due in part to security concerns; *Grant v. Fisher*, No. 07-1870, 2012 WL 28260 at *1 (M.D. Pa. Jan. 5, 2012) (permitting modifications to prison surveillance video before evidence was shown at trial). Beyond the security concerns, it is unlikely that the travel logs, log books, and traffic control logs would have relevance to Plaintiff’s case, which concerns medical treatment provided by DOC’s medical provider. See *Rega v. Beard*, No. 08-156, 2010 WL 1253531 at *6 (W.D. Pa. Mar. 24, 2010) (denying production of log books to plaintiff finding that the logs, even if they provided the names and times personnel visited a unit, would not provide proof that they witnessed any particular activity that Plaintiff believes occurred).

Caleb L. McGillvary – Subpoena Duces Tecum
April 29, 2025
Page 4

Additionally, NJDOC objects to the disclosure of the log books for this period because it would provide information to Plaintiff information about other incarcerated persons. New Jersey law recognized restrictions on the provision of information to one inmate about other inmates. See N.J.A.C. 10A:22-2.3(b) (“[a]n inmate shall not be permitted to inspect, examine, or obtain copies of documents concerning any other inmate.”).

RESPONSE:

Notwithstanding and without waiving said objections, please see the following:

- Potentially relevant entries in the New Jersey State Prison Clinic Officer Log Book (DOC.McGillvary.Logbook.001-008).

Caleb L. McGillvary – Subpoena Duces Tecum
April 29, 2025
Page 5

CERTIFICATION

Caleb L. McGillvary v. Ronald Reiz, et al.
Civil Dkt. No. 3:22-cv-06430-MAS-JBD

1. I am an Attorney at Law of the State of New Jersey. My State of New Jersey Attorney Identification Number is 02801-2001.
2. I was sworn in and admitted as an Attorney at Law of the State of New Jersey and the United States District Court for the District of New Jersey on July 5, 2002. Additionally, I was sworn in and admitted to practice before the United States Court of Appeals for the Third Circuit on January 20, 2004.
3. I am employed by the State of New Jersey Department of Corrections (DOC) as a Legal Specialist in its Division of Diversity and Legal Affairs. My duties include assisting in the coordination, preparation, and handling of DOC's processing of inmate and employee generated litigation; providing support and direction to the litigation liaisons in each correctional facility; and updating and advising the Commissioner on the status and potential impact of pending litigation. It is in this capacity that I am familiar with the instant case.
4. I hereby certify on behalf of the New Jersey Department of Corrections, that I have reviewed the Responses to Plaintiff's supplemental subpoena requests contained in his correspondence dated January 31, 2025, with counsel and that I am aware that a good faith search for documents responsive to the request has been made by the New Jersey Department of Corrections.
5. I further certify that as of this date, to the best of my knowledge and information, the production is complete and accurate based upon information maintained by Defendant, New Jersey Department of Corrections.

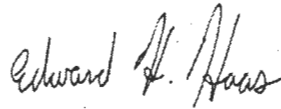
Caleb L. McGillvary – Subpoena Duces Tecum
April 29, 2025
Page 6

6. The following is a list of the identity and source of knowledge of those who provided information in this matter:

No.	Bates No.	Source	Summary
1	DOC.McGillvary.Logbook.001-008	New Jersey Department of Corrections	Entries in the New Jersey State Prison Clinic Officer Log Book

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By:



Edward H. Haas, Esq., M.S.W.
Legal Specialist and Department ADA Coordinator
Department of Corrections
Division of Diversity and Legal Affairs

Dated: April 29, 2025

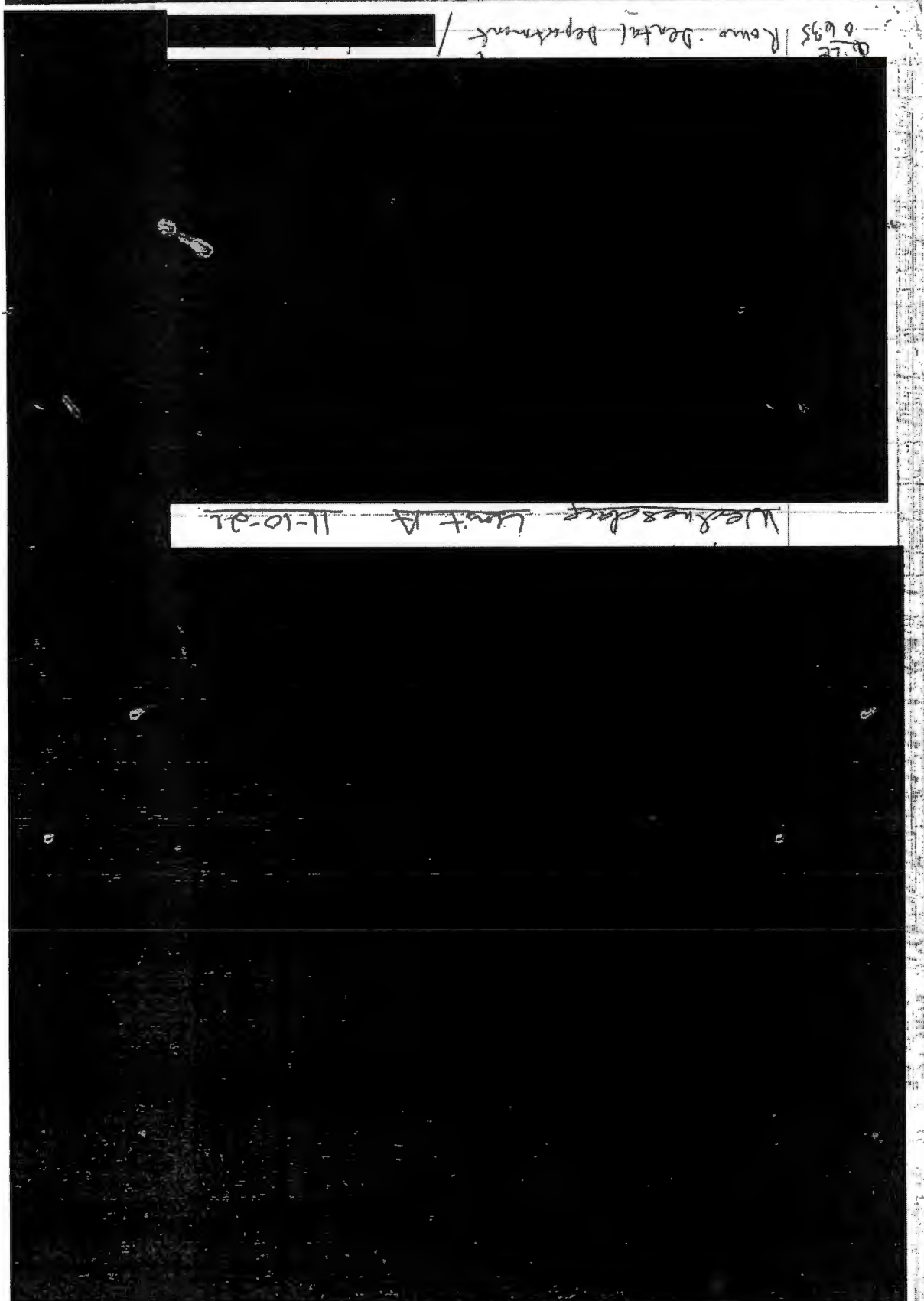
EXHIBIT C

Fridley Unit A Contm. 139
12/17/21

0058 Romo, T. h

Tuesday UNIT A 11-30-2021

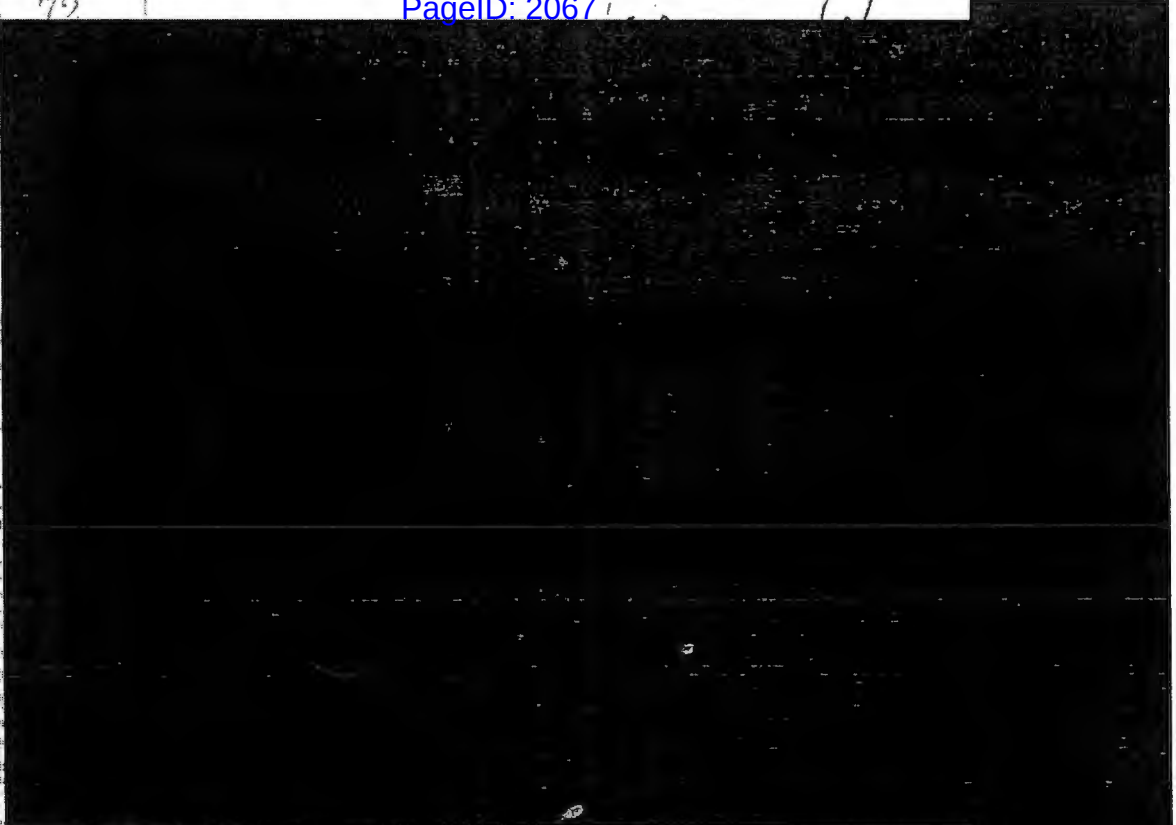
0640 nurse Dental Reyes on unit



Wednesday Unit A 11-10-21

0.25 0.95 / Room: Dental Department

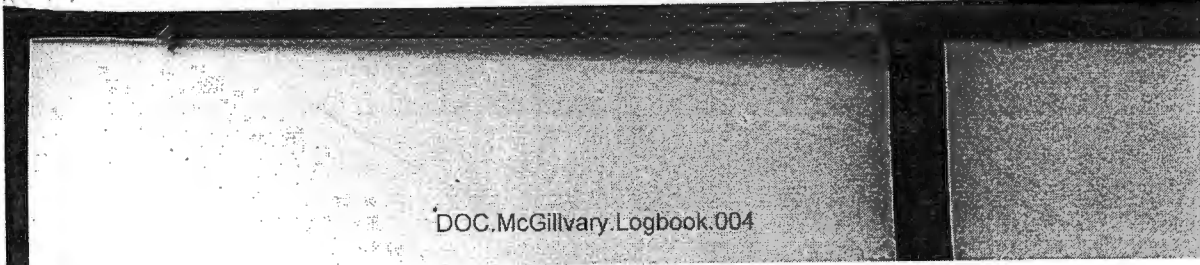
72

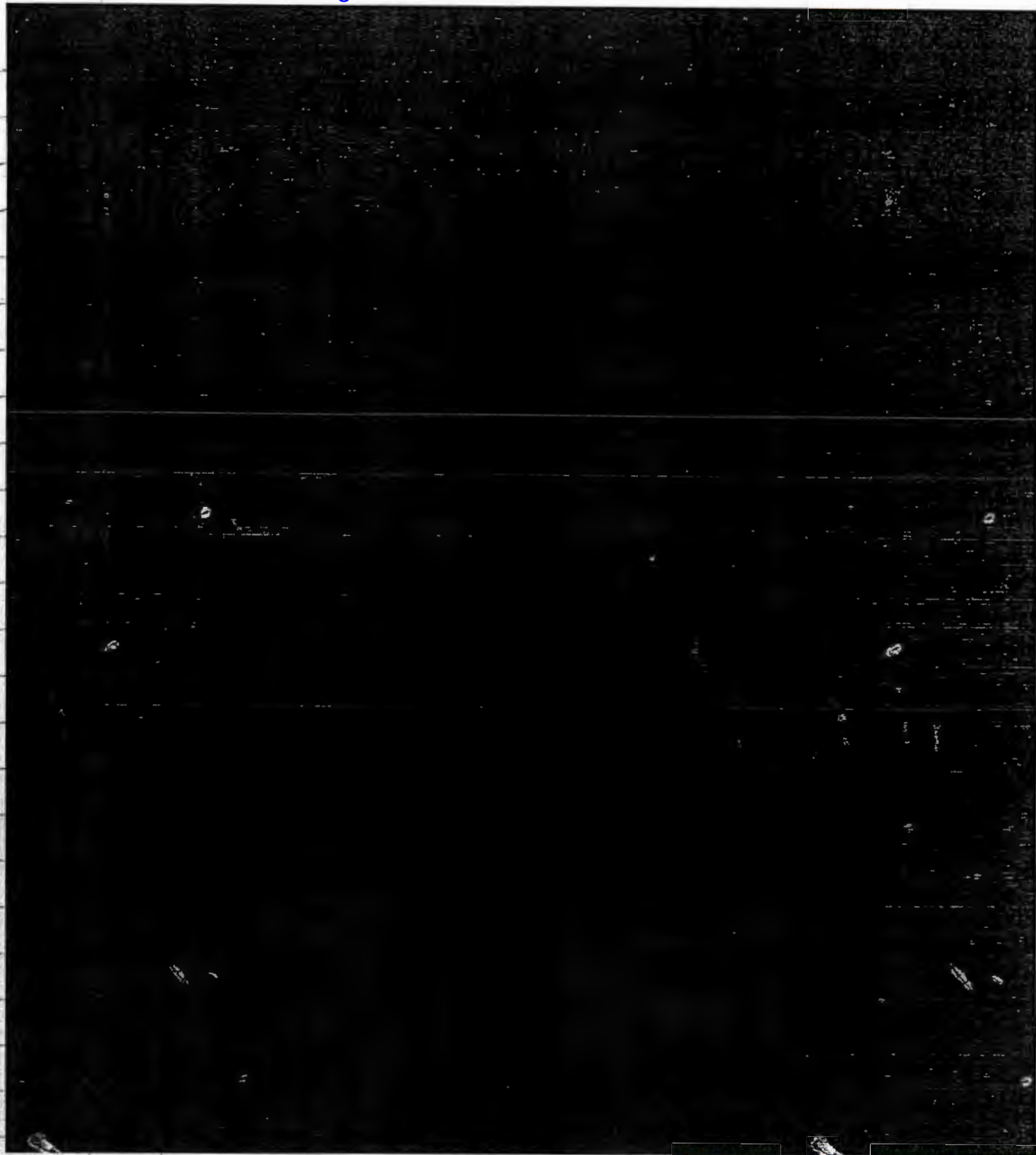


Twelav Unit A 11/9/21



0647 Romo, Daniel, Department





Friday

Unit A

1-14-22



0638

DOC.McGillvary.Logbook.005

Dental Reiz in clinic

Friday

Unit A

1-14-22

0638

Dental Reiz in clinic

Tuesday
Ch:

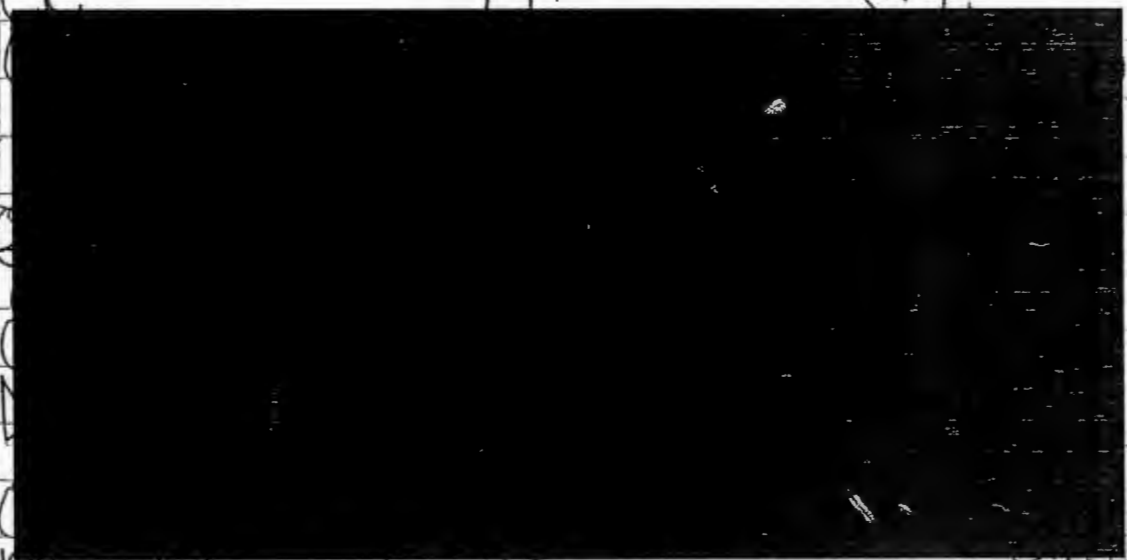
Unit A
LT:

1/11/22
Sat:

Dental Hygiene Rahmo



Wednesday Unit A 11/11/22
11/11/22



Dental Hygiene Rahmo

EXHIBIT D

Caleb L. McGillvary, Pro Se
#1222665/SBI#102317G NJSP
PO Box 861 Trenton, NJ 08625

January 31, 2025

Matthew McNeil, DAG
NJ Ofc. Of the Atty Gen.
Hughes Justice Complex
PO Box 112, 25 Market St.
Trenton, NJ 08625-0112

RE: Caleb L. McGillvary v. Rahmo Reiz
Civil Action No. 3:22-cv-06430-MAS-JBD
Hon. Michael A. Shipp, U.S.D.J.
Hon. J. Brendan Day, U.S.M.J.

Dear Mr. McNeil;

Pursuant to Judge Day's direction during the January 30, 2025 teleconference, in the above-captioned matter, please review and provide the subpoena requested material for the following dates for the period from 6:30am-5:00pm; specifically, all of the entries in which I am mentioned or otherwise appear; from the 6 Right NJSP Travel Log, the NJSP Traffic Control Log, the North Compound Clinic NJSP Travel Log, the 6 Right NJSP Officer Log Book, and the North Compound Clinic Officer Log Book:

1.) 11/1/21, 11/2/21, 11/3/21, 11/9/21, 11/10/21,
11/15/21, 11/16/21, 11/17/21, 11/23/21, 11/30/21,
12/1/21, 12/2/21, 12/6/21, 12/7/21, 12/8/21, 12/9/21,
12/13/21, 12/14/21, 12/15/21, 12/16/21, 12/17/21,
12/20/21, 12/22/21

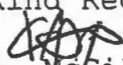
Additionally, please provide the subpoena requested material for the following dates for the period from 6:30am-5:00pm; specifically, all of the entries in which Defendant Rahmo Riez is

mentioned or otherwise appears; from the 6 Right NJSP Officer Log Book, and the North Compound Clinic Officer Log Book:

2.) 1/10/22, 1/11/22, 1/12/22, 1/13/22, 1/14/22

Your kind attention to this matter is appreciated.

Kind Regards,


Caleb L. McGillvary
In Propria Persona

ENCL:

CC: FILE

CONFIDENTIAL MATERIALS
FILED UNDER SEAL

EXHIBIT F

Traffic Control Log

April 8, 2025

Time	Name	INM#	Housing Unit	Type	Comment	Book	Badge #	Arrival	Return
04:45 P.M.	KALIM, RAJHN	420404	NJSP-SOUTH-1 EE-CELL 19L	MED	NJSP MED	TK			
04:45 P.M.	MARSH, FRANK	682079	NJSP-SOUTH-1 EE-CELL 30L	MED	NJSP MED	TK			
04:45 P.M.	MASSENBURG, ANTHONY	785552	NJSP-WEST-6 RIGHT-2 TIER-CELL 51	MED	NJSP MED	TK			
04:45 P.M.	MOREL, JOSE	1245958	NJSP-WEST-2 RIGHT-FLATS-CELL 17	MED	NJSP MED	TK			
04:45 P.M.	POTEAT, JOHN	291775	NJSP-WEST-6 LEFT-FLATS-CELL 26	MED	NJSP MED	TK			
04:45 P.M.	RENDFREY, FRANK	733611	NJSP-WEST-2 LEFT-FLATS-CELL 16	MED	NJSP MED	TK			
04:45 P.M.	SUGGS, VIRGIL	898138	NJSP-WEST-2 RIGHT-FLATS-CELL 41	MED	NJSP MED	TK			
04:45 P.M.	TINEO, JOHNNY	1224378	NJSP-WEST-2 RIGHT-FLATS-CELL 23	MED	NJSP MED	TK			
04:45 P.M.	VENABLE, JERMAINE	1306522	NJSP-WEST-2 RIGHT-2 TIER-CELL 127	MED	NJSP MED	TK			
04:45 P.M.	WILLIAMS, MARTEY	699829	NJSP-SOUTH-1 EE-CELL 17L	MED	NJSP MED	TK			
04:45 P.M.	WILLIS, ROBBY	802521	NJSP-WEST-6 LEFT-3 TIER-CELL 128	MED	NJSP MED	TK			
07:30 P.M.	OLMO, RAFAEL	900479	NJSP-WEST-6 RIGHT-FLATS-CELL 19	MED	NJSP MED	TK			
Caseload:	NJSP								
Agency:									
Liv. Unit:									

EXHIBIT G

WING OFFICERS TRAVEL LOG

DATE _____

[illegible]

* This completed sheet must be turned into Traffic Control Desk at the end of the day.